

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MASSACHUSETTS**

ERIC FORSYTHE, et al.,	)	Civil Action No. 04cv10584 (GAO)
	)	
Plaintiff,	)	<b>Consolidated Case Nos.:</b>
	)	04-10584-GAO
vs.	)	
	)	
SUN LIFE FINANCIAL INC., et al.,	)	
	)	
Defendants.	)	

**PROPOSED INTERVENORS' ASSENTED-TO MOTION FOR LEAVE TO  
FILE REPLY TO DEFENDANTS' OPPOSITION TO PROPOSED INTERVENORS'  
MOTION TO INTERVENE**

Plaintiffs respectfully request leave of this Court pursuant to Local Rule 7.1(B)(3) to submit their Reply Memorandum in Support of Proposed Intervenor's Motion to Intervene. In support of this Motion, Proposed Intervenor states that Defendants' Opposition to their motion raised new issues and authorities which the Reply analyzes and rebuts. Proposed Intervenor believes that the Reply will aid the Court in its determination of the issues presented by the pending motion.

Finally, Plaintiffs state that Defendants have assented to this request.

WHEREFORE, Proposed Intervenor respectfully requests that the court grant leave for them to file the accompanying Reply Memorandum in Support of Proposed Intervenor's Motion to Intervene.

Dated: June 28, 2006

Respectfully submitted,

**MOULTON & GANS, P.C.**

By: /s/ Nancy Freeman Gans

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**Counsel for Plaintiffs and Proposed Intervenors**

**CERTIFICATE OF COMPLIANCE WITH LOCAL RULE 7.1(a)(2)**

I, Nancy Freeman Gans, Esquire, Moulton & Gans, P.C., Liaison Counsel for the Plaintiffs and Proposed Intervenors hereby certify that I conferred on June 28, 2006 with Defendants' counsel William Paine, Esq., Wilmer Cutler Pickering Hale and Dorr regarding the within motion. Mr. Paine assented to the Motion on behalf of all Defendants.

/s/ Nancy Freeman Gans  
Nancy Freeman Gans

**CERTIFICATE OF SERVICE**

I, Nancy Freeman Gans, hereby certify that I served a copy of the foregoing document upon counsel for all parties via ECF this 28<sup>th</sup> day of June.

/s/ Nancy Freeman Gans  
Nancy Freeman Gans